

## Remarks

### *A. Status of Claims*

This paper amends claims 1, 12, 20, 28, 31, 34, 39, 42, 45, 48, and 50, and cancels claims 25 and 26, without prejudice or disclaimer to the subject matter recited therein. Claims 1-24 and 27-50 remain in this application and are presented for reconsideration. No new matter has been added.

### *B. Title*

In the subject Office Action, the Examiner proposes a new title, which Applicant finds acceptable. Therefore, this paper amends the title as suggested by the Examiner.

### *C. Informal Drawings*

The drawings pending in this application have been objected to as being informal. Filed herewith are formal drawings. Withdrawal of the drawing objections is respectfully requested.

### *D. Claim Interpretation*

On pages 2 and 3 of the subject Office Action, the Examiner proposes some definitions for terms appearing in the claims of this application. Applicant respectfully asserts that the definitions proposed by the Examiner are overly restrictive. Specifically, the terms “first programs,” “second programs,” “third programs,” and “fourth programs,” are clearly defined in the specification, for example, in the paragraph spanning pages 5 and 6. Applicant respectfully asserts that the meanings of these four terms should take the meaning explained there, including the alternative definitions provided in the specification. To do otherwise would be to incorrectly provide an unjustifiably narrow interpretation of the claims of this application.

*E. Claim Rejection Under 35 U.S.C. § 112, First Paragraph*

On pages 3 and 4 of the subject Office Action, the Examiner contends that claim 15 does not comply with the requirements of 35 U.S.C. § 112, first paragraph. More specifically, the Examiner does not believe that claim 15 has been enabled since the Examiner “is unclear as to who is conducting the query for determining the next action.” Applicant respectfully traverses this rejection.

In particular, Applicant observes that claim 15 is a method claim, and recites no structure whatsoever. Thus, the identification of “who” is performing the functions is not even relevant. In addition, Applicant respectfully asserts that the functions contained in claim 15 (as well as the functions appearing in independent claim 1 and intervening dependent claims 12, 13, and 14) are fully disclosed and supported in the present specification, for example, at page 23.

In light of these comments, Applicant respectfully requests the withdrawal of the rejection of claim 15 under § 112, first paragraph.

*F. Claim Rejection Under 35 U.S.C. § 112, Second Paragraph*

In the paragraphs spanning pages 4 and 5 of the subject Office Action, the Examiner levies several claim definiteness rejections based on 35 U.S.C. § 112, second paragraph. Applicant provides the following responses to the individual rejections.

With respect to claim 48, the word “adapted” has been canceled. It is noted that this has also been done with respect to claim 42, even though claim 42 was not rejected.

With respect to claims 25 and 26, these claims have been canceled, without prejudice or disclaimer, thus eliminating the basis for this rejection.

With respect to claims 39 and 45, the word “translatable” has been deleted from these claims, thus eliminating the basis for this rejection.

Turning now to claim 7, Applicant notes that the complete phrase used in claim 7 is “application specific shared objects.” It is noted that the phrase “application specific” is a well-known term of art, and that the phrase “shared objects” is also a term of art used in the UNIX environments. With this explanation, Applicant respectfully asserts that claim 7 is not indefinite.

Finally, with respect to claims 29 and 42, the Examiner believes the use of the word “associated” in these terms allegedly renders these claims indefinite. It is noted that in each instance the word “associated” is used in connection with an element that has been previously recited and connected with existing elements, and that the word “associated” is used simply to state functional relationships with other recited elements. As such, claims 29 and 42 are definite and in total compliance with the requirements of § 112, second paragraph.

In light of these comments, applicant respectfully requests the withdrawal of the rejection of claims 7, 29, 39, 42, 48, and 45 under 35 U.S.C. § 112, second paragraph.

*G. Claims 1-24 and 27-50 are patentable under 35 U.S.C. § 103*

Original claims 1-50 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Deans (U.S. Patent No. 6,341,368) in view of the Dewey publication. In light of the above-detailed claim amendments and following discussion, Applicant respectfully traverses this rejection.

In accordance with the present invention, a unique application procedural interface (API) is provided that includes functions such as calls and/or call-backs which are used for passing parameters between and among a plurality of programs. These programs may include an application program, a library, a plurality of shared objects or plug-ins, and one or more active models (respectively referred to in the application and claims as first programs, second programs, third programs, and fourth programs). As explained in the specification, the

application procedure interface (for example, item 125 appearing in FIG 1, and interface module 215 appearing in FIGS. 2A-2C), functions during program runtime to dynamically coordinate the interaction between the recited sets of programs. Thus, the interface function performed by the present invention occur during runtime and after compilation. This is explained in the specification, for example, at page 6, lines 12-18, and in FIGS. 2A-2C (described in detail at page 10, line 27 through page 12, line 17). In particular, FIGS. 2A-2C present some of the exemplary runtime details of the present invention.

Consistent with this disclosure, independent claims 1, 20, 28, 31, 34, 42, 48, and 50 have all been amended to specify that the functions being performed, including the various interactions between the first, second, third, and fourth programs, all occurred during runtime.

In contrast, the Deans reference presents so-called multi-instanced software that modifies existing software to apply to different practical applications, and this modification occurs during compilation and before runtime. More specifically, Deans deals with a link access protocol module (LAPM) which is used in a modem for simultaneous voice and data processing. FIG. 6 of Deans, described at col. 5, lines 13-21 (and relied upon extensively by the Examiner in the subject Office Action) presents a so-called preprocessor for converting single-instance code into multi-instanced code during program compilation, and not during runtime. The flowchart of FIG. 7, described in col. 5, lines 23-52, describes the function of the preprocessor of Fig. 6, and is consistent.

Thus, in contrast with the presently claimed invention, the Deans reference deals with converting single-instance code into multi-instanced code during program compilation, and does not disclose or suggest the dynamic interface of programs during runtime as required by the presently claimed invention.

Turning now to the Dewey publication, Applicant agrees with the Examiner that Dewey discloses a typical computer-aided design (CAD) system for use in designing integrated circuits. However, Dewey does not supply the above-noted discrepancies existing in the Deans reference.

Thus, with the clarifying "runtime" amendment to each of the independent claims pending in this application, Applicant respectfully asserts that claim 1-24 and 27-50 recite patentable subject matter.

*H. Conclusion*

Applicant believes the foregoing to be a fully and complete response to the subject Office Action, and respectfully requests the withdrawal of the rejection of claims 1-24 and 27-50, the allowance of these claims, and the issuance of a timely Notice of Allowance.

Should the Examiner believe that a personal discussion would be helpful, he is encouraged to contact the undersigned attorney at 512/536-3005 with any questions, comments or suggestions relating to the referenced patent application.

Respectfully submitted,



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Date: September 27, 2004